

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ZODIAC POOL SYSTEMS LLC and  
ZODIAC POOL CARE EUROPE,

Plaintiff,

v.

WYBOTICS, CO. LTD. f/k/a Tianjin  
Wangyuan Environmental Protection and  
Technology Co., Ltd.,

Defendant.

Case No. 2:25-cv-582

**PLAINTIFFS' CERTIFICATE OF INTERESTED  
ENTITIES OR PERSONS**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Plaintiffs Zodiac Pool Systems LLC and Zodiac Pool Care Europe state as follows:

1. Zodiac Pool Systems LLC is a wholly owned subsidiary of Fluidra Commercial, SAU;
2. Zodiac Pool Care Europe is a wholly owned subsidiary of ZPES Holdings, SAS;
3. Fluidra, S.A. is publicly traded on the Spanish Stock Exchange and indirectly owns more than 10% of Zodiac Pool Systems LLC and Zodiac Pool Care Europe's interest.

Dated: May 23, 2025

Respectfully submitted,

/s/ Melissa R. Smith

Melissa R. Smith  
Texas State Bar No. 24001351  
GILLAM & SMITH, LLP  
303 South Washington Avenue

Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257  
Email: melissa@gillamsmithlaw.com

Of Counsel:

KILPATRICK TOWNSEND & STOCKTON LLP

Steven D. Moore  
Two Embarcadero Center, Suite 1900  
San Francisco, CA 94111  
Telephone: (415) 576-0200  
Facsimile: (415) 576-0300  
Email: smoore@ktslaw.com

Kevin Bell  
1400 Wewatta Street, Suite 600  
Denver, CO USA 80202  
Telephone: (303) 571-4000  
Facsimile: (303) 571-4321  
Email: kbell@ktslaw.com

Kathleen R. Geyer  
1420 Fifth Ave., Suite 3700  
Seattle, WA 98101  
Telephone: (206) 467-9600  
Facsimile: (206) 623-6793  
Email: kgeyer@ktslaw.com

Christopher S. Leah  
1100 Peachtree Street NE, Suite 2800  
Atlanta, GA 30309  
Telephone: (404) 815-6500  
Facsimile: (404) 815-6555  
Email: cleah@ktslaw.com

*Attorneys for Zodiac Pool Systems LLC and Zodiac  
Pool Care Europe*